



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 15, 2021

**BY ECF**

Hon. Sidney H. Stein  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED, p. 2**

Re: *United States v. Inigo August Philbrick*, 20 Cr. 351

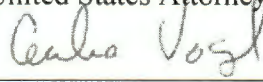
Dear Judge Stein:

The Government respectfully requests to adjourn its deadline to complete discovery, currently set for June 18, 2021, and the pretrial conference scheduled for June 22, 2021, for an additional 60 days. The Government requests these adjournments because the parties are in discussions regarding a potential resolution of the case, and the parties require additional time to pursue these discussions. The Government will produce discovery to the defendant on a rolling basis but seeks an additional 60 days to complete discovery given that discovery is voluminous. In addition, the Government requests that the Court exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7) until the date of the next pretrial conference so that the parties may pursue their discussions regarding a pretrial disposition and the defendant may review the discovery and consider any potential pretrial motions. The defendant consents to the requested adjournments and the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:

  
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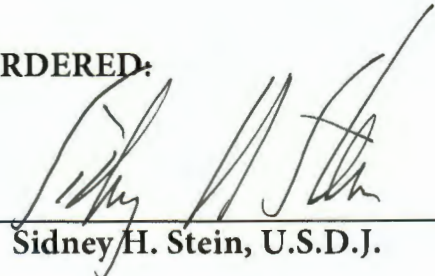
cc: Jeffrey Lichtman, Esq., and Jeffrey Einhorn, Esq., via ECF

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The last day for the government to complete discovery is extended to September 14, 2021. The conference is adjourned to September 14, 2021, at 9:00 a.m. The time is excluded from calculation under the Speedy Trial Act from today until September 14, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).

Dated: New York, New York  
June 17, 2021

SO ORDERED:



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Sidney H. Stein, U.S.D.J.